

January 24, 2013

***Via Electronic Filing***

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: *Ex Parte* Presentation, Promoting Expanded Opportunities for Radio Experimentation and Market Trials under Part 5 of the Commission's Rules and Streamlining Other Related Rules, ET Docket No. 10-236; 2006 Biennial Review of Telecommunications Regulations – Part 2 Administered by the Office Of Engineering and Technology, ET Docket No. 06-105**

Dear Ms. Dortch:

On January 22, 2013, CTIA—The Wireless Association® and several CTIA members met with Staff of the Office of Engineering and Technology regarding the agency's upcoming Report and Order revising the Commission's Part 5 rules addressing Experimental Radio Service ("ERS") licensing procedures. Specifically, Christopher Guttman-McCabe and Brian Josef of CTIA, Brian Benison of AT&T, Cathy Massey of Clearwire, Steve Sharkey of T-Mobile USA, and Tamara Preiss of Verizon met with Julius Knapp, Ira Keltz, Bruce Romano, Geraldine Matise, Walter Johnston and Rodney Small of the Office of Engineering and Technology.

During the meetings, CTIA and the wireless providers emphasized that any changes to streamline the experimental licensing process must contain sufficient interference protections for incumbent licensees and must not shift substantial burdens to these incumbents. The parties explained the essential role of coordination, rather than simple notification, by the ERS applicant prior to submitting a detailed plan to avoid interference to potentially affected incumbent licensees. Further, the parties stressed that incumbent licensees should receive at least 30 days' notice of a proposed experiment to allow adequate time for review of the proposed use of their licensed spectrum. The parties explained the benefits to all stakeholders of providing clarity and certainty in the rules regarding how an incumbent licensee can raise concerns about potential interference and stop the processing of the application while the applicant and affected incumbent licensees address and resolve those concerns. Finally, CTIA explained that the Commission should limit experimental and developmental licenses, at least initially, to two-year terms.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office.

Sincerely,

*/s/ Brian M. Josef*

Brian M. Josef

cc: Julius Knapp  
Ira Keltz  
Bruce Romano  
Geraldine Matisse  
Walter Johnston  
Rodney Small